

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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April 9, 2003

BY E-MAIL AND
FIRST CLASS U.S. MAIL

Cheryl M. Kimball, Esq.
Keegan, Werlin, & Pabian, LLP
21 Custom House Street
Boston, MA 02110

Re: New England Gas Company, D.T.E. 03-22

Dear Ms. Kimball:

Enclosed is the First Set of Information Requests by the Department of Telecommunications and Energy to New England Gas Company regarding the captioned matter. Please submit copies of the Company's responses to the information requests to the Department by 5:00 p.m., April 23, 2003.

Should you have any questions please contact me at (617) 305-3762. Thank you for your prompt attention to this matter.

Sincerely,

Jody Stiefel
Hearing Officer

Enc.
cc: Mary Cottrell, Secretary

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. 03-22

**FIRST SET OF INFORMATION REQUESTS TO
NEW ENGLAND GAS COMPANY**

The Department of Telecommunications and Energy ("Department") submits to New England Gas Company ("Company") the following Information Requests.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request refers to the Company's 2002 SQ report filed on March 3, 2003 ("Filing"). The North Attleboro Service Area shall be referred to as the North Attleboro division; the Fall River Service Area shall be referred to as the Fall River division.
2. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer. Provide electronic versions of all responses including calculations and worksheets. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed **but no later than April 23, 2003**.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or their witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "**historical data**" refers to data for the years **1992 through 2001**.
5. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
6. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which

information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

7. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
8. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department; also submit four (4) copies of the responses to Jody M. Stiefel, Hearing Officer, and (2) copies to Glenn Shippee, Rates and Revenue Requirements Division.

Requests

- | | |
|----------|--|
| DTE 1-1 | Refer to the Company's Filing at § I-3. Please supply all raw data and work papers regarding the North Attleboro division's "Service Appointments Kept". |
| DTE 1-2 | Refer to the Company's Filing at § I-4. How does the North Attleboro division plan on increasing its "Customer Survey" satisfaction rate? |
| DTE 1-3 | Refer to the Company's Filing at § I-4. Please provide any raw data and work papers that relate to the "Customer Survey" performed by the North Attleboro division for this performance period. |
| DTE 1-4 | Refer to the Company's Filing at § I-3. Please provide all raw data and work papers for the North Attleboro division's "Response To Odor Calls". |
| DTE 1-5 | Refer to the Company's Filing at § I-1. Under the category of "Telephone Answering Factor," what is the cause for the Fall River division's percentage of calls answered (37.76 percent) within a 20 second time interval? |
| DTE 1-6 | Refer to the Company's Filing at § I-1. Please provide all raw data and back-up work papers for the Fall River division's "Service Appointments Kept." |
| DTE 1-7 | Refer to the Company's Filing at § I-1. Please provide all raw data and work papers for the Fall River division's "Response To Odor Calls." |
| DTE 1-8 | Refer to the Company's Filing at § I-2. Under "Unaccounted For Gas," please explain the increase in accounted for gas for the 2002 performance period. |
| DTE 1-9 | Refer to the Company's Filing at § I-2. Please explain the decrease in "Capital Expenditures" for 2002 for the Fall River division. |
| DTE 1-10 | How does the Fall River division plan to increase the level of customer satisfaction in the 2003 performance period? |

- DTE 1-11 Refer to the Company's Filing at § I-2. Please provide any raw data and work papers which relate to the "Customer Survey" performed for the Fall River division.
- DTE 1-12 Refer to the Company's Filing at § I-2. Please explain the decrease in staffing levels in the Fall River division for the 2002 performance period.
- DTE 1-13 Please detail the internal audits that have been conducted to assure the accuracy of Company data. If internal audits have not been performed, please indicate the Company's plans to perform such audits.
- DTE 1-14 Please explain how each of the following SQ measures were recorded and measured:
- (a) Telephone Answer Factor;
 - (b) Emergency Answering;
 - (c) Service Appointments Kept;
 - (d) Meter Reads;
 - (e) Bill Adjustments;
 - (f) Lost Time Accident Rate;
 - (g) Response to Odor Calls;
 - (h) Restricted Work Day Rate.

In your response, indicate if the Company faced any recording and measurement issues and how they were resolved. Provide documentation to support your answer.

- DTE 1-15 Please explain why ten years of data are not available for the following SQ measures and reporting requirements: Billing Adjustments; Lost Work Time Accident Rate; Consumer Cases; Staffing Levels; Restricted Work Day; Property Damage; Capital Expenditures; and Accidents.
- DTE 1-16 Please provide calculations of any potential penalty or offset amount for all SQ penalty measures in which the Company's performance exceeded the relevant benchmark or deadband, if any.
- DTE 1-17 Please refer to the Company's Filing at §§ I-1, 1-3. Do the statistics for Consumer Division Cases and Billing Adjustments include only residential customers? If not, please provide information for only residential customers.
- DTE 1-18 For each of the SQ measures and reporting requirements, please detail the initiatives the Company has implemented during 2002 to improve its performance.

- DTE 1-19 For each of the SQ measures and reporting requirements, please detail any conditions under which the Company operated during 2002 that may have influenced the results the Company achieved.
- DTE 1-20 Please explain one the Company filed one annual report although the North Attleboro division and the Fall River division have separate SQ plans.